

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

WILLIAM PARRISH, Individually and On Behalf  
of Others Similarly Situated,

v.

PREMIER DIRECTIONAL DRILLING, L.P.

CASE NO: 5:16-cv-00417-DAE  
COLLECTIVE ACTION

JUDGE DAVID A. EZRA

MAGISTRATE JOHN W. PRIMOMO

**PARRISH’S MOTION FOR ENTRY OF STANDARD PROTECTIVE ORDER**

Premier Directional Drilling, L.P. (“Premier”) has withheld various documents, citing the lack of a protective order. In its responses to Parrish’s first set of requests for production alone, Premier lodged 15 such objections to individual requests, as well as an (improper)<sup>1</sup> global objection. Ex. A.

William Parrish therefore moves the Court to enter the District’s standard Protective Order. L.R. CV-appx. H. The protective order specifies the conditions under which private, sensitive, and/or legally confidential documents and information in possession of the Parties must be exchanged, used, and protected in this litigation, and authorizes the Parties to disclose that information in response to discovery requests.

This protective order is justified by Federal Rule of Civil Procedure 26(c), Local Civil Rule 26, and relevant case law. Based on Premier’s representations, the entry of such a protective order is necessary in order for Premier to produce relevant and essential discovery. The form of Parrish’s proposed Protective Order has already been approved by virtue of Local Civil Rule 26(c).

Parrish therefore respectfully requests that the District’s Standard Protective Order be adopted by order of the Court.

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<sup>1</sup> See, e.g., *Abraham v. Cavender Boerne Acquisition of Texas, Ltd.*, No. SA-10-CA-453-XR, 2011 WL 13127173, at \*5 (W.D. Tex. Apr. 26, 2011) (Primomo, Mag.).

Respectfully submitted,

**BRUCKNER BURCH PLLC**

*/s/ Matthew S. Parmet*

By: \_\_\_\_\_

Richard J. (Rex) Burch  
Texas Bar No. 24001807  
Matthew S. Parmet  
Texas Bar No. 24069719

8 Greenway Plaza, Suite 1500  
Houston, Texas 77046  
Telephone: (713) 877-8788  
Telecopier: (713) 877-8065  
[rburch@brucknerburch.com](mailto:rburch@brucknerburch.com)  
[mparmet@brucknerburch.com](mailto:mparmet@brucknerburch.com)

Michael A. Josephson  
Texas Bar No. 24014780  
Andrew W. Dunlap  
Texas Bar No. 24078444  
**FIBICH, LEEBRON, COPELAND,  
BRIGGS & JOSEPHSON**  
1150 Bissonnet  
Houston, Texas 77005  
Telephone: (713) 751-0025  
Telecopier: (713) 751-0030  
[mjosephson@fibichlaw.com](mailto:mjosephson@fibichlaw.com)  
[adunlap@fibichlaw.com](mailto:adunlap@fibichlaw.com)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

On February 9, 2016, I served a copy of this document on all registered parties and/or their counsel of record, via the Court's CM/ECF system.

*/s/ Matthew S. Parmet*

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Matthew S. Parmet

**CERTIFICATE OF CONFERENCE**

Prior to filing this Motion, Parrish's Counsel attempted to confer to reach agreement. On February 7, 2017, I sent correspondence to Premier's Counsel requesting agreement to the Western District's standard protective order and/or Premier's Counsel's availability to confer via telephone. Ex. B. No response of any kind was received.

Accordingly, this motion is filed as "opposed."

***/s/ Matthew S. Parmet***

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Matthew S. Parmet